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6
7 UNITED STATES DISTRICT COURT

8 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION
9

10 TAMARA WAREKA p/k/a TAMARA
WILLIAMS,

11 Plaintiff,

12 vs.

13 ELSIE GREEN INC. and DOES 1 through 10,
14 inclusive,

15 Defendants.

Case No. 4:23-cv-03160 HSG

**JOINT STIPULATION AND ORDER AS
MODIFIED TO EXTEND TIME TO
ANSWER OR OTHERWISE RESPOND
TO COMPLAINT AND TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE**

The Hon. Haywood S. Gilliam, Jr.

Action Filed: June 26, 2023
Trial Date: Not Set

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STIP AND ORDER AS MODIFIED TO EXTEND
TIME TO RESPOND TO COMPLAINT AND TO
CONTINUE INITIAL CMC - Case No. 4:23-cv-
03160 HSG

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Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, Defendant Elsie Green, Inc. (“Defendant” or “Elsie Green”) and Plaintiff Tamara Wareka p/k/a Tamara Williams (“Plaintiff” or “Wareka”) respectfully submit this joint stipulation to continue the deadline for Defendant to answer or otherwise respond to the Complaint and to continue the Initial Case Management Conference (“CMC”):

WHEREAS on June 26, 2023, Plaintiff filed the Complaint (Dkt. No. 1);

WHEREAS on June 27, 2023, the Court issued an order setting an initial CMC for September 26, 2023, at 2:00 p.m., along with related deadlines (Dkt. No. 6);

WHEREAS on September 20, 2023, Plaintiff served its Complaint on Defendant (Dkt. No. 9);

WHEREAS Defendant’s response to the Complaint is currently due on October 11, 2023 (Dkt. No. 9);

WHEREAS, on September 21, 2023, the Court granted Plaintiff’s Motion to Continue the CMC (Dkt. No. 10), and ordered the CMC set for October 24, 2023 (Dkt. No. 11);

WHEREAS Defendant just recently retained outside counsel from Farella Braun + Martel LLP, who are still investigating the facts alleged in Plaintiff’s Complaint. Accordingly, Defendant requires additional time to prepare its response to the Complaint. To that end, Defendant has requested, and Plaintiff has agreed to provide, a six-week extension of the deadline to answer or otherwise respond to the Complaint, to and including **November 22, 2023**;

WHEREAS, this is Defendant’s first request for an extension of time;

WHEREAS, this extension of time will alter the date of the continued CMC, and the related deadlines, already fixed by Court order;

WHEREAS, this stipulation is made without prejudice to any party requesting a further continuance of the initial CMC for good cause shown;

NOW, THEREFORE, THE PARTIES HEREBY STIPULATE, and request that the Court order, as follows:

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STIP AND ORDER AS MODIFIED TO EXTEND
TIME TO RESPOND TO COMPLAINT AND TO
CONTINUE INITIAL CMC - Case No. 4:23-cv-
03160 HSG

1 1. Defendant's time to answer or otherwise respond to the Complaint shall be
2 extended to **November 22, 2023**.

3 2. The initial Case Management Conference shall be continued to **February 13, 2024**,
4 at 2:00 p.m., or as soon thereafter as convenient for the Court.

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6 Dated: October 9, 2023

FARELLA BRAUN + MARTEL LLP

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8 By: /s/ Sushila Chanana
Sushila Chanana

9 Attorneys for Defendant ELSIE GREEN, INC.

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11
12 Dated: October 9, 2023

HIGBEE & ASSOCIATES

13
14 By: /s/ Mathew K. Higbee
Mathew K. Higbee
15 Ryan E. Carreon

16 Attorneys for Plaintiff TAMARA WAREKA f/k/a
TAMARA WILLIAMS

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19 **ATTESTATION**

20 I, Sushila Chanana, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that concurrence in
21 the filing of this document has been obtained from each signatory hereto.

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23 /s/ Sushila Chanana
Sushila Chanana

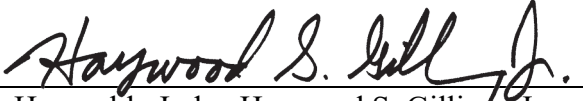
24 Attorneys for Defendant ELSIE GREEN, INC.

PURSUANT TO STIPULATION, AND AS MODIFIED, IT IS SO ORDERED:

1. Defendant Elsie Green, Inc.'s time to answer or otherwise respond to the Complaint shall be extended to **November 22, 2023**.

2. The Telephonic Initial Case Management Conference shall be continued to **December 12, 2023**, at 2:00 p.m., and the parties shall submit a joint case management statement by **December 5, 2023**. The dial-in information and instructions remain the same as previously provided in docket no. 8.

Dated: 10/10/2023


The Honorable Judge Haywood S. Gilliam, Jr.
U.S. District Judge